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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TEOFIL BRANK,
aka "Jarec Wentworth,"

Defendant.

No. CR 15-00131-TJH

STIPULATION REGARDING DISCLOSURE
OF PERSONAL IDENTIFICATION
INFORMATION RELATED TO THE VICTIM

Plaintiff United States of America, by and through its counsel of record, the United States Attorney for the Central District of California and Assistant United States Attorney Kimberly D. Jaimez, and defendant TEOFIL BRANK ("defendant"), by and through his counsel of record, Seema Ahmad and Ron Chowdhury, hereby file this Stipulation Regarding Disclosure of Personal Identification Information related to the Victim in this case.

1. The evidence in this matter includes the personal identification information for the Victim, including but not limited

1 to, the Victim's name, addresses, date of birth and Social Security
2 Number (collectively "personal information").

3 2. References to the Victim's personal information are found
4 throughout the discovery in this case, which include, among other
5 records, DMV records, phone records, employment records and records
6 and personal information from defendant's, Victim's and third
7 parties' cellular telephone numbers.

8 3. The parties stipulate, and request the Court to order, that
9 all (i) court filings referencing the Victim in this matter shall
10 redact the Victim's name and reference the Victim only as "D.B." or
11 "Victim" and (ii) court filings specifically discussing the Victim's
12 personal details (even without mentioning the Victim's name) shall be
13 filed under seal.

14 4. The parties further stipulate and request the Court
15 prohibit the parties from disclosing Victim's personal information to
16 third parties (except in connection with the parties' investigation
17 and preparation of the case for trial) including, but not limited to,
18 disclosing Victim's personal information to the press or media
19 outlets, directly or indirectly, for the purpose of harassing the
20 Victim.

21 5. The parties further stipulate, and request the Court to
22 order, that only defense counsel, defense counsel's legal staff
23 (including paralegal assistants, legal secretaries, defense
24 investigators, and lawyer-associates) and defendant may review the
25 unredacted personal information contained in the discovery in
26 preparation for trial, and that defense counsel, defense counsel's
27 legal staff and defendant may only use the unredacted personal
28

1 information or any portion thereof for the specific purpose of
2 preparing or presenting a defense in this matter and for no other
3 purpose.

4 6. The parties further stipulate, and request the Court to
5 order, that only defense counsel and defense counsel's legal staff
6 may make copies of any discovery containing unredacted personal
7 information, and may not release any such copies to any third party.

8 7. The parties further stipulate and request the Court to make
9 its Order applicable to unredacted personal information contained in
10 all of the discovery produced in this case, including any discovery
11 produced after entry of its Order.

12 8. The parties further agree that within 90 days of the
13 conclusion of this criminal matter, defense counsel will collect and
14 destroy any and all copies of documents and portions thereof
15 containing the personal information that defense counsel possesses
16 and/or has made and distributed to his legal staff for the purpose of
17 preparing or presenting a defense in this matter, except a copy set
18 as necessary to maintain in defense counsel's case file. Litigation
19 of this matter includes any appeal filed by the defendant, and any
20 motion filed by the defendant pursuant to 28 U.S.C. § 2255. If
21 defendant does not file a motion pursuant to 28 U.S.C. § 2255, and
22 the deadline for filing such a motion has expired, the defense team
23 shall certify that the discovery has been destroyed within 90 days of
24 such expiration.

25 9. In the event that there is a substitution of counsel prior
26 to when such documents must be destroyed, new counsel must join this
27 protective order before any personal information may be transferred
28

1 from undersigned counsel to new counsel, who then will become the
2 custodian of all personal information and who shall then become
3 responsible for destroying all personal information in the discovery
4 upon the conclusion of appellate and post-conviction proceedings.

5 10. By signing this stipulation, counsel for defendant
6 represents that they have discussed the contents of this stipulation
7 and proposed order with their client, that their client has no
8 objection to this stipulation and the relief requested in the
9 proposed order, and that their client agrees to abide by the terms of
10 the proposed order.

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